

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

HENRY KYLE FRESE,

Defendant.

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Case No. 1:19-cr-00304-LMB

DEFENDANT’S UNOPPOSED MOTION TO PERMIT TRAVEL

Defendant HENRY KYLE FRESE, by and through counsel, respectfully asks this Court for permission to travel by car from his residence in Philadelphia to Washington, D.C. and Reston, Virginia on Wednesday, February 19, 2020 through Friday, February 21, 2020. The purpose of the travel is for Mr. Frese to attend meetings with his attorneys and to attend the Change of Plea Hearing set for Thursday, February 20, 2020 at 2:00PM. Mr. Frese is specifically asking for permission to stay overnight from February 19 to February 21, 2020 with a friend, A.E., who resides in Reston, Virginia, and who Mr. Frese affirms had no involvement in the charged offense conduct. Undersigned counsel has consulted with counsel for the United States, who have indicated that the government does not oppose Mr. Frese’s travel and his stay with the aforementioned individual in Reston, Virginia. Pretrial Services has also been made aware of Mr. Frese’s travel request and have indicated that they will await the ruling of the Court.

WHEREFORE, based on the foregoing good cause, Defendant respectfully requests that this Court grant him permission to travel from Philadelphia, PA to Washington, DC, and Reston, Virginia, from Wednesday, February 19 through Friday, February 21, 2020.¹

¹ This Court previously granted Mr. Frese’s motion to travel to visit with his attorneys in December 2019 and January 2020, under the same conditions proposed here. *See* Dkt. Nos. 33 & 35.

Date: February 12, 2020

Respectfully submitted,

HENRY KYLE FRESE

By Counsel,

/s/ Stuart Sears

Stuart Sears

Schertler & Onorato, LLP

901 New York Avenue, N.W.

Suite 500

Washington, DC 20001

Telephone: (202) 628-4199

Facsimile: (202) 628-4177

ssears@schertlerlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2020, I electronically filed a true copy of the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties.

/s/ Stuart Sears
Stuart Sears
Schertler & Onorato, LLP
901 New York Avenue, N.W.
Suite 500
Washington, DC 20001
Telephone: (202) 628-4199
Facsimile: (202) 628-4177
ssears@schertlerlaw.com